

UNITED STATE DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

Docket No.: 04-Cv-11340DPW

STEPHEN KEEFE,
Plaintiff

v.

LOCALS 805, INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION,
AFL-CIO, et. al,
Defendants

**ASSENTED TO MOTION OF THE PARTIES TO
EXTEND THE SCHEDULING ORDER**

Now come the parties in the above-captioned matter and move this Court to extend the Scheduling Order. As reasons therefor, the parties state the following:

1. Per the Scheduling Order, the discovery period is schedule to end on March 10, 2006. [See Order dated 11/18/05]. No party will be prejudiced by this motion as it is assented to.
2. Additionally, no decision has yet been rendered by the Court regarding the Motion to Compel that had previously been filed by the Plaintiff. If the Court were to decide the issue today, the parties have already determined that due to each counsel's schedules, the depositions [sought to be compelled] would not be completed prior to March 10, 2006.
3. Discovery is still ongoing. Specifically, the deposition of the Plaintiff has not taken place as yet (due to scheduling conflicts, where the parties have been unable to coordinate mutually convenient dates for same).

4. The Plaintiff's deposition had been scheduled for January 17, 2006, was continued to February 6, 2006 at the Plaintiff's request, and then again continued at the request of defense counsel (due to scheduling conflicts).

5. It has already been determined, in conversations held between the parties, that there is no date at which counsel would be available between now and March 10, 2006 to complete the Plaintiff's deposition.

WHEREFORE, all parties request that the Tracking Order be amended to extend each of the present deadlines by ninety (90) days, thereby resulting in an Amended Scheduling Order, with the dates to be extended as follows:

1.	Discovery to be completed by	June 10, 2006
2.	Dispositive motions by	August 1, 2006
3.	Oppositions (to any Motions) by	September 1, 2006

Dated: February 9, 2006

Respectfully submitted,
The Defendants,
Locals 805, International
Longshoremen's Association,
AFL-CIO, et al.


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Assented to by the Plaintiff,
Stephen Keefe,
By his attorney,

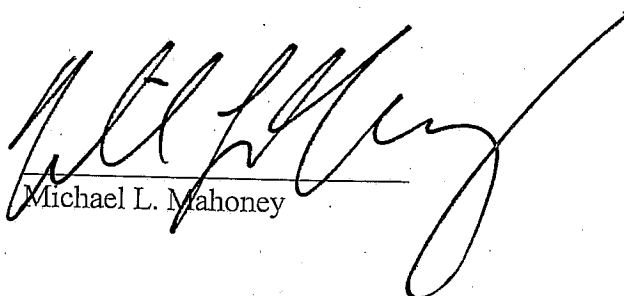
 (MLM)
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CERTIFICATE OF SERVICE

I, Michael L. Mahoney, hereby certify that I have served a true copy of the within document this 8 day of February, 2006, via electronic mail and via first class mail, postage prepaid upon the following:

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